COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer Covenior

Patricia A. Nolan MD, MPH **Executive Director** 

May 26, 19923

Mr. Richard J. Schassburger U. S Department of Energy Rocky Flats Office, Bldg 116 P.O. Box 928 Golden, Colorado 80402-0928

Industrialized Area IM/IRA RE:

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the Environmental Protection Agency (EPA) hereby request that DOE develop and implement an Interim ' Measure/Interim Remedial Action (IM/IRA) for the Industrialized Area (IA) of the Rocky Flats Plant pursuant to Paragraph 150 of the IAG. This IM/IRA must accomplish the following:

- 1) Develop and implement a monitoring network for surface water, ground water, and air around the periphery of the IA, capable of detecting contaminant release or migration, which would operate until such time as the entire IA was remediated and buildings decontaminated and decommissioned, and
- 2) Develop and implement administrative and financial capability allowing DOE to respond, in a timely manner, to any contaminant release or migration from the IA before remediation and building decontamination and decommissioning is complete.

The agencies believe this IM/IRA is necessary because, as activities accomodate decontamination within the change to decommissioning, the risk of contaminant release or migration may increase due to non-routine activities. This necessitates ongoing comprehensive monitoring of the IA.

The agencies request that a scoping meeting for this IM/IRA occur no later than June 18, 1993. In addition, we believe that a draft IM/IRA decision document should be submitted to the agencies for review by <u>December 31, 1993</u>. Therefore, we request that your staff evaluate this request and notify us of the time and location for the first scoping meeting concerning this IM/IRA.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 692-3356 or Bill Fraser (EPA) at 234-1081.

Sincerely,

Gary W. Baughman, Chief

Facilities Section

Hazardous Waste Control Program

Martin Hestmark, Manager

Rocky Flats Team

Environmental Protection

Agency

CC: Daniel S. Miller, AGO

[Pames K. Hartman, DOE

Wanda Busby, EG&G

Jackie Berardini, CDH-OE

INTEGRATED OPERABLE UNITS IHSSS

			<u> </u>			ACCESS	AFFECTED		MEET	SCOPE	SCOPE/PROPOSED ACTIONS	CHOMS	
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9 121 P14	648		75 707 C	Outside portion accessible for test pits	117	
9 121 P15	785			707 Accessible tight area	7 1	
9 121 P16	170			9 Accessible for test pits	117	
9 121 P19	603			Outside portion tight but accessible	١١ /	
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PA=Asphalt PC=Concrete OHE=Overhead Electrical OHP=Overhead Pipe P=Pipe C=Columns T=Tanks EQ=Other Equip WP=Well points F=Fence RR=Raikoad Tracks NI=Non intrusive 0=Out Protected Area 1=In Protected Area 2=In Exclusion Area

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9 121 PO8	135		22	881	881 Questionable close to 881		ON	
9 121 P17	1130		88	629	559 Questionable close to 559		1 N	
9 121 P18	150	-	89	707	707 Questionable close to 559		1 N	
9 121 P20	499		တ	774	774 Questionable close to 777 778		N	
9 121 P22	1205	-	93	177			N	
9 121 P30	667	<u> </u>	8	1777	777 linaccessible under 777		Z	
9 121 P31	167	<u></u>	8	774	774 Inaccessible under 771		2	
9 121 P32	907		87	777			N	
9 121 P33	140		100	774	774 Inaccessible under 771		N	
9 121 P51	170		100	778	778 Inaccessible under 778		N	
9 121 P52	280		100	443	443 Inaccessible under 443		NO	
9 121 P53	82	-	17	881	881 Questionable close to 881		NO	
9 121 P54	138		0	1881	881 Inaccessible under 881		NIO	_
9 121 P55	158		53	881	881 Questionable close to 881		NO	
9 121 T02	1x3000gal		901	441	441 Inaccessible under 441	_	NO	
9 121 705	12x4000gal		300	444	444 Active		NIO	
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9 121 T17	4x6000gal		9	774	774   Under 774		N L	
9 121 T24	7x2700gal		0	887	887 Active		NO	
9 121 T25	2x750gel		8	883	883 Active		20	
9 121 T26	3x750gal	-	8	883	883 Active		NO	
9 121 T30	1x23000gal		0	707	707 Active		Z	
9 121 731	NA	٤	AA		Invalid location	AN	Z	
9 121 T32	11x132000gal		100	887	887 Active		ON	~
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9 121 134	NA	=	ΝΑ		Invalid location	NA	z	
9 121 T35	NA	_	NA		Invalid location	AN	Z	
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# INDUSTRIAL AREA OU INTEGRATION IHSS EVALUATION

OUs 8,9,10,12,13,14

#### **PURPOSE**

The purpose of this effort is to evaluate the Industrial Area Operable Units (IA OUs) to determine a basis for scheduling of intrusive work activities (consistent with the Phase I RFI/RI Work Plans) following implementation of the non-intrusive field work in FY93 and FY94. In the most recent Five Year Plan intrusive field work of all the IA OUs were categorically linked to completion of transition and D&D efforts. The result of this assumption was that a majority of the intrusive work was pushed into the outyears by 5 years and as much as 22 years. Certainly, there are IHSSs that need to be deferred to completion of D&D, especially large IHSSs adjacent to buildings. However, there are several IHSSs that should not be linked to D&D efforts and based on historical knowledge these IHSSs would most likely require minimal intrusive work and may be closed. The main driver for this effort is to identify these select IHSSs for intrusive work that can be performed independent of D&D efforts and transition and move this work into the FY94 budgeting effort.

Also, funding levels in FY93 were inadequate to maintain compliance with the IAG milestones, this IHSS evaluation effort will provide the scope and schedule to support upcoming extension requests to the agencies for the IA OUs. Several factors that are considered for the IHSS evaluation are and part of the approach for scheduling and implementation of intrusive work for the IA OUs are

- Current Funding and outyear funding levels
- Programmatic issues
- Transition and D&D interaction
- Physical access restrictions e.g. utilities
- Proposed intrusive activities
- Location and access
- OU Work Plan compliance

EG&G is evaluating each IA OU on an IHSS per IHSS basis. The information collected is being compared to a set of selection criteria used to provide the basis for estimating what work can be performed following the non-intrusive field work and what work should be deferred. The scope of each IA OU IHSS is limited to the anticipated initial stages of intrusive field work efforts used for producing the budget information for the Five Year Plan. The individual Phase I RFI/RI Work Plans also detail some intrusive work, but most of the intrusive efforts are to follow the results of the non-intrusive field work in FY93.

## **PROCESS**

The IHSS evaluation is to serve as a decision tool for proposed intrusive work for the IA OUs. The main question that needs to be answered is which IHSSs should be linked to D&D effort and which IHSSs could be worked on immediately following the non-intrusive effort. This effort is designed to meet three goals and to based on as much factual information as possible. These goals are

Demonstrate to EPA and CDH that investigation of the IA OUs is dependent on D&D

and transition efforts

- 2 Provide definitive guidance for outyear planning efforts and thus reduce last minute planning decisions that don't make sense
- 3 Provide a basis for requesting extensions for IAG milestones for the IA OUs

Each IA OU has been evaluated on an IHSSs per IHSSs basis. The results of this effort are presented on the attached spreadsheets. The purpose of the information in the spreadsheet is to provide a basis for meeting selection criteria for evaluating each IHSSs and then making a decision to move intrusive work into FY94 or to have the work linked to D&D efforts. The IHSS data presented is based on information from the Phase I RFI/RI Work Plans, historical records, site photos, and field inspections. The idea is to provide the best information regarding the physical layout of the IHSS, location, access restrictions, paving, utility locations and security requirements. The information presented is a result of RPM's ongoing effort to date.

#### IHSS Selection Criteria

#### SIZE

The approximate dimensions of each IA OU IHSS are listed in the attached spreadsheet. The dimensions are given and used for the basis of selecting IHSSs on size alone. The overall assumption that applies to this selection criteria is that smaller IHSSs inherently require less intrusive field work and are more likely to be characterized earlier in the investigative process. Also, there is a higher probability that smaller IHSSs will meet closure criteria from implementation of the first stage of intrusive field work. Thus, further requirements for investigation or remediation may be met and the IHSS closed. Size selection criteria only relates to the layout and relative size of the IHSS. No consideration is given to the type of contaminants, location of utilities etc. Overall, large IHSSs would not meet the size selection criteria, thus the relative weight for selecting the IHSS for early characterization would be reduced. However, there still may be instances where larger IHSSs would be selected for early investigation. The rationale for selection of large IHSSs would be explained on a case-by-case basis. The specific criteria that an IHSS would be selected is as follows.

 The IHSS dimension must be less that 100 ft by 100 ft. This dimension is used to describe relative area coverages. For example an IHSS measuring 150 ft by 20 ft would meet the size selection criteria because the area is less the given coverage dimension.

Note IHSS dimensions listed in the spreadsheet are approximate. A majority of the IHSSs vary in shape and are not simply described as rectangular forms. The dimensions in the spreadsheet are listed as rectangular dimensions to provide total coverage of the IHSS and to simplify the IHSS selection process.

If the IHSS meets the above selection criteria, the IHSS is chosen for implementation of intrusive field activities. The size criteria accounts for roughly 25 percent of the total weight of the overall selection of the IHSS.

## **ACCESS**

These criteria are mainly related to selecting an IHSS based on future D&D and transition efforts. The criteria and their associated weighting towards overall selection of the IHSS are

Surface Coverage (10%) - the type of IHSS surface material related to paving type i.e.

asphalt, concrete, natural or artificial fill materials, determined from aerial photos and field inspections

- Utility Locations (10%) concerned mainly with overhead types of utilities.
   Underground utilities are likely to be a problem anywhere in the industrial area.
   Specific utility maps are being evaluated but were not part of this selection criteria.
- Stored Material (15%) consists of materials stored on IHSSs which can include equipment, hazardous and non-hazardous waste material, stocked materials, etc Usually items stored on IHSSs can be moved or worked around

All of the access criteria were evaluated on an IHSS per IHSS basis from historical data, work plan information and onsite field inspections. For this effort RPM perform field inspections on each IHSS of the IA OUs. The field inspections are the basis for estimating, the access coverages and selection of the IHSS for intrusive activities. The main goal of the access criteria is to evaluate relative ease for performance of intrusive field work. For example if any IHSS is paved with concrete and utilities are identified in the IHSS then selection of the IHSS for early intrusive field work may not be possible, then investigation of the IHSS would be deferred until completion of D&D activities.

#### LOCATION

Two selection criteria are used for evaluation of IHSS location 
The criteria and overall weighted percentages are as follows

- Security Areas (15%) is the IHSS located in or out of the Protected Area, Exclusion
   Zone or other security restricted areas
- Building Coverage (25%) some IHSS are adjacent to or are covered by buildings. This
  is a major criteria for relating IHSSs to D&D and transition activities. In the
  spreadsheet the IHSS building coverages are given in a percentage and then the
  appropriate building(s) are listed. If a building is not listed but a building percentage
  covered is listed, then the criteria is applied to other physical barriers e.g. a tank
  located in the IHSS, etc.

# **IHSS SELECTION**

When an IHSS has been selected for intrusive field activities then the column in the spreadsheet "Meet Selection Criteria" is checked "yes". The spreadsheet was sorted on the "Meet Selection Criteria" column and the IHSSs are listed on an OU by OU basis are the ones selected for early intrusive field work. The other columns on the far right of the spreadsheet are the estimated scope of work for the IHSSs based on the Phase I RFI/RI Work Plans and outyear budgeting efforts. Overall, this IHSS selection effort is still in a "draft" stage and revisions will be made. As more information is collected the spreadsheets will be updated